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**Rocky Mountain
Remediation Services, L.L.C.**
... protecting the environment

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February 21, 1996

96-RM-WM-00032-KH


Tim Hedahl
Kaiser-Hill Company
ER/WM&I
Rocky Flats Environmental Technology Site
P. O. Box 464
Golden, Colorado 80402-0464

**NATIONAL ENVIRONMENTAL POLICY ACT (NEPA) DOCUMENTATION FOR THE RCRA LIQUID WASTE
VERIFICATION PROJECT - JAC-029-96**

Action: Transmittal of Draft Categorical Exclusion (CX) to DOE

Enclosed is a draft letter to DOE requesting a NEPA review. The subject project has been reviewed by the Kaiser-Hill NEPA Group which recommends that the project be categorically excluded from further NEPA documentation. The draft CX determination is included for your review and an electronic copy of the draft determination has been made available. Your assistance is needed to transmit the draft CX to the DOE project contact.

If you have questions or need additional information, please contact Gislinde Engelmann at extension 7825 or digital page 7461.


John A. Ciucci, Manager
Waste Storage and Disposal

GGE:cn

Enclosure:
As Stated

cc:
J. A. Ciucci, RMRS
D. R. Lobdell, "
E. J. Poling, "
A. P. Power, "

23.240.FWM

ADMIN RECCRD

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IA-A-000721

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Reginald W. Tyler
NEPA Compliance
DOE, RFFO

**NATIONAL ENVIRONMENTAL POLICY ACT (NEPA) DOCUMENTATION FOR
RCRA LIQUID WASTE VERIFICATION PROJECT - TGH-XXX-96**

The subject project has been reviewed by the Kaiser-Hill NEPA group which recommends that the project be categorically excluded from further NEPA documentation requirements. The draft categorical exclusion determination is included for your review and an electronic copy of the draft determination has been made available.

Please provide a final NEPA determination for this project. If you have any questions or need additional information, please contact Steve Nesta at extension 6386.

T. G. Hedahl, Director
ER/WM&I Operations

Orig. and 1 cc - R. W. Tyler

Attachment:
As Stated

cc:
P. M. Powell - DOE, RFFO
S. M. Nesta - Kaiser-Hill
J. A. Ciucci - RMRS
A. P. Power - RMRS

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**DOE NEPA REGULATIONS SUBPART D
CATEGORICAL EXCLUSION (CX) DETERMINATION - RFFO/CX00-96**

Proposed Action: RCRA Liquid Waste Verification Project

Location: Building 556, Rocky Flats Environmental Technology Site, Golden, CO

Proposed by: U.S. Department of Energy Rocky Flats Field Office (DOE, RFFO)

Description of the proposed action:

Rocky Flats Field Office proposes to perform verification of samples of liquid waste from RCRA 90-day accumulation areas as required by the Site's State RCRA Operating Permit. The purpose of the requirement to perform waste verification is to ensure that the generator's characterization is accurate and complete. The proposed waste verification project will replace an existing waste fingerprinting process currently performed in Building 881 and will save an estimated \$775,000 in FY 1996 with even higher savings anticipated in FY 1997. The scope of waste verification will be limited to five routine tests for 1) physical appearance, 2) specific gravity, 3) miscibility with water, 4) color comparison, and 5) ignitability. Non-routine testing such as Department of Transportation corrosivity testing will also be performed as necessary. Approximately 30 to 35 containers (drums) containing RCRA-regulated liquid waste will be sampled and field tested each month in staging areas such as 90-day accumulation areas. After field testing, the sample would be taken to Building 556 (Figure 1) for the final ignitability test. This test will consume approximately 2 milliliters of sample volume and after this final test all of the remaining sample will be returned to the original container and waste characteristic information will be revised as necessary. Building 556 is a 225 square foot facility immediately adjacent to the Site's General Warehouse (Building 551) and formerly housed a metal cutting operation. The project would install a surplus lab hood and two-stage HEPA air mover into this building to process any air emissions resulting from ignitability testing. Heating, lights, and power are all currently available.

In addition to the aforementioned cost savings, the proposed project would provide the Site with a higher level of compliance with the RCRA permit. This project will provide a 24 hour turnaround of verification information to the Waste Generator, as opposed to the two to eight week delay that the current system imposes on the waste verification process. This provides the Waste Generator with more time to achieve compliance with the permit requirements.

Hazards presented to personnel involved with sample verification will be mitigated by the use of qualified Waste Generators equipped with the proper personnel protective equipment and safe work practices as directed by OSHA (29 CFR 1910.120) and Site requirements (Health and Safety Practices Manual, Integrated Work Control System, etc.). Site-specific Radiological Work Permits and Health and Safety Plans, as required, will further ensure the safety of workers performing this project. Hazards presented to the environment from Building 556 air emissions will be mitigated by the use of a pre-filter and single-stage HEPA filter. This activity will be evaluated to determine whether air emissions exceed either monitoring or permitting thresholds.

The proposed project will produce very little waste. After testing, the waste verification samples will be returned to their original containers. Approximately 1 cubic foot of hazardous waste will be generated each month, consisting of PPE and other combustible materials. All waste will be stored onsite in approved storage areas (e.g., RCRA Unit 1).

The project is expected to begin March 1996 and the annual cost estimate is approximately \$50,000. This categorical exclusion will remain in effect indefinitely but will be revisited annually for applicability.

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Categorical Exclusion to be applied:

B3.1 Site characterization and environmental monitoring, including siting, construction, operation, and dismantlement or closing (abandonment) of characterization and monitoring devices and siting, construction, and operation of a small-scale laboratory building or renovation of a room in an existing building for sample analysis. Activities covered include, but are not limited to, site characterization and environmental monitoring under CERCLA and RCRA. Specific activities include, but are not limited to: (a) Geological, geophysical (such as gravity, magnetic, electrical, seismic, and radar), geochemical, and engineering surveys and mapping, including the establishment of survey marks; (b) Installation and operation of field instruments, such as stream-gauging stations or flow-measuring devices, telemetry systems, geochemical monitoring tools, and geophysical exploration tools; (c) Drilling of wells for sampling or monitoring of groundwater or the vadose (unsaturated) zone, well logging, and installation of water-level recording devices in wells; (d) Aquifer response testing; (e) Installation and operation of ambient air monitoring equipment; (f) Sampling and characterization of water, soil, rock, or contaminants; (g) Sampling and characterization of water effluents, air emissions, or solid waste streams; (h) Installation and operation of meteorological towers and associated activities, including assessment of potential wind energy resources; (i) Sampling of flora or fauna; and (j) Archeological, historic, and cultural resource identification in compliance with 36 CFR part 800 and 43 CFR part 7.

Justification:

The proposed action would renovate an existing facility for the purposes of verifying RCRA-regulated liquid waste streams by sample analysis. The size of the facility (225 square feet), coupled with the limited scope of analyses (five routine tests), and cost (\$50,000 annually) qualify the proposed action as a small-scale. The proposed action supports the Site's RCRA permit requirements and will be located in an existing facility that requires only minor changes in equipment.

**DOE NEPA REGULATIONS SUBPART D
CATEGORICAL EXCLUSION (CX) DETERMINATION - RFFO/CX00-96
RCRA Liquid Waste Verification Project**

I have determined that the proposed action meets the requirements for a categorical exclusion as defined in Subpart D of 10 CFR 1021. Therefore, I approve the categorical exclusion of the proposed action from further NEPA review and documentation.

Date: _____

Signature: _____
Reginald W. Tyler
RFFO NEPA Compliance Officer

